SUMMARY OF THE QUALITY SYSTEMS COMMITTEE TELECONFERENCE APRIL 20, 1999

The Quality Systems (QS) Committee of the National Environmental Laboratory Accreditation Conference (NELAC) met by teleconference on April 20, 1999, at 10 a.m. Eastern Daylight Time (EDT). The meeting was led by its chair, Mr. Joe Slayton of the U.S. Environmental Protection Agency (USEPA) Region III. A list of action items is given in Attachment A. A list of participants is given in Attachment B. A list of parking lot issues and is given in Attachment C. Attachment D presents the QS Committee approach to handling comments, comment acknowledgment form letter, commenter template, and guiding principles for reviewing comments and the standard. Changes to the language in Chapter 5 proposed at this teleconference are reflected in version 5.10.6 of the standard. *The purpose of the meeting was to: review action items from the previous teleconferences, discuss the revisions to the air testing requirements, discuss initial demonstration of capability, consider new members for the QS Committee, and discuss additional comments.*

REVIEW OF ACTION ITEMS FROM THE PREVIOUS MEETING BY TELECONFERENCE

The committee reviewed the action items from the previous meeting by teleconference, which was held on April 6, 1999. Items not already completed or addressed at today's meeting will be carried over to the next meeting.

The committee provided Mr. Slayton with additional contacts for individuals with whole effluent toxicology expertise. Mr. Slayton will see if they are willing to respond to the comments received on this topic (Section D.2).

The committee discussed Mr. David Mendenhall's proposed deletion of the first sentence in the second paragraph of Section D1.1.a.1, which is shown below:

> ~~Each sample in the affected batch must be assessed against the above criteria to determine if the sample datum is acceptable.~~ Any sample associated with the contaminated blank shall be reprocessed for analysis or the results reported with appropriate data qualifying codes.

The concern is that the first paragraph of this section talks about batch acceptance while the second paragraph addresses sample acceptance. This organization of topics is confusing and this sentence may not add anything to this section. The committee agreed to eliminate the first sentence. It will, however, be revisited at the next meeting because the point was raised that a sample within an affected batch may not be contaminated (i.e., a sample with a lower concentration than the contaminated blank) and leaving this sentence allows a laboratory flexibility in dealing with such samples.

SECTION D.5, AIR TESTING

Mr. Cliff Glowacki distributed a revised version of Appendix D.5 on Air Testing. The committee reviewed the new version of Section D.5 and provided comments to clarify the language and maintain consistency with the other parts of Appendix D. These changes will be incorporated into Section D.5 as presented in revision 5.10.6 of Chapter 5.

DEMONSTRATION OF CAPABILITY

The QS Committee discussed Sections 5.6.2, 5.10.2.1, and Appendix C, all of which deal with demonstration of capability. The following issues were discussed.

- Section 5.6.2 should deal with personnel issues and 5.10.2.1 should focus on equipment or method changes. Addressing personnel issues in 5.10.2.1 would be redundant. The QS Committee felt that this redundancy was useful and the note concerning work cells in 5.6.2.c will be copied to 5.10.2.1. The definition of work cell should be added to the glossary.

- Section 5.10.2.1 deals not only with initial demonstration of capability but continuing demonstration as well. The title and language in this section should be changed accordingly. Similar changes should be made in Appendix C.

- Regarding demonstration of capability and work cells. When a new technician joins a work cell, demonstration of capability should be done as an ongoing process during the analysis of quality control samples and measurement samples. New personnel would be under the supervision of experienced staff who have the responsibility for the quality of the generated data until the new technician is trained. The standard should address this ongoing demonstration of capability and the supervised training process

- The standard should address what constitutes a failure to demonstrate capability during this ongoing process. In addition, the standard should address the procedure for corrective action and then redemonstrating capability after the corrective action has been completed.

- At some point, it may be necessary to "start over" and perform an initial demonstration of capability, for instance if all the personnel or a majority of the personnel in a work cell must be replaced. In addition, the standard should address at what point must an initial demonstration of capability be performed.

- It may be difficult for a new technician to pass an initial demonstration of capability without gaining any practical experience in the analytical technique.

NEXT MEETING

The next meeting by teleconference is scheduled for April 28, 1999 from 2 p.m. to 5 p.m. EDT. .

Attachment A

ACTION ITEMS
QUALITY SYSTEMS COMMITTEE
APRIL 20, 1999

Item No.	Action Item	Date to be Completed
1.	Mr. Slayton to contact individuals, provided by members of the QS Committee, who have expertise in whole effluent toxicity about addressing comments directed to Section D.2 of Chapter 5.	
2.	Review Mr. Raymond Frederici's responses to comments from Quanterra on Sections 5.4.2, 5.7.1, and 5.11.3.	April 28th teleconference
3.	Revisit Mr. Mendenhall's proposed deletion of the first sentence in the second paragraph of Section D1.1.a.1.	April 28th teleconference
4.	Mr. Slayton to review Chapter 5 and correct the language (including acronyms) that refers to initial demonstration of capability that should refer more generally to demonstration of capability.	

Attachment B

PARTICIPANTS
Quality Systems Committee
April 20, 1999

Name	Affiliation	Phone Numbers
Mr. Joe Slayton	USEPA, Region III, OASQA	T: 410-305-2653 F: 410-305-2698 E: slayton.joe@epamail.epa.gov
Ms. Mary K. Bruch	Mary Bruch Micro Reg. Inc.	T: 703- 589-1514 F: 703- 779-0267 E:
Mr. Raymond J. Frederici	Recra Labnet - Chicago	T: 708-534-5200 F: 708-534-5211 E: frederir@recra.com
Mr. Clifford R. Glowacki	Ashland Chemical Company	T: 614-790-3482 F: 614-790-4294 E: cglowacki@ashland.com
Ms. Sylvia S. Labie (Board Liaison)	Florida Department of Environmental Protection	T: 904-488-2796 F: 904-922-4614 E: labie_s@dep.state.fl.us
Mr. David Mendenhall	Utah Department of Health	T: 801-584-8470 F: 801-584-8501 E: dmendenh@doh.state.ut.us
Ms. Sheila Meyers	Texas Natural Resource Conservation Commission	T: 512-239-0425 F: 512-239-6307 E: smeyers@tnrcc.state.tx.us
Mr. Jeff Nielson (Absent)	City of Tallahassee Water Quality Division	T: 850-891-1232 F: 850-891-1062 E: nielsenj@mail.ci.tlh.fl.us
Mr. Donivan R. Porterfield	Los Alamos National Laboratory	T: 505-667-4710 F: 505-665-5982 E: dporterfield@lani.gov
Mr. Scott D. Siders	Illinois Environmental Protection Agency	T: 217-785-5163 F: 217-524-0944 E: epa6113@epa.state.il.us
Dr. Fred Siegelman	US EPA, QAD	T: 202-564-5173 F: 202-564-2441 E: siegelman.frederic@epamail.epa.gov
Mr. Mike Cross (Contractor Support)	Research Triangle Institute	T: 202-728-2045 F: 202-728-2095 E: myc@rti.org

Attachment C

PARKING LOT ITEMS/ISSUES
QUALITY SYSTEMS COMMITTEE
APRIL 20, 1999

Items/issues will remain in the Parking Lot until they are completed.

1. Air Appendix

Need to review and finalize

2. Initial Demonstration of Capability:

Need to address an IDOC for tests for which you can not spike. Also, does IDOC need to be universal and address all medias? Donivan Porterfield is lead.

3. Definitions/Glossary

Changes necessary to be consistent with Program Policy and Structure proposal. QS Committee will review definitions/glossary at interim meeting.

4. Need to vote in two new members to QS committee.

All candidates must be identified and voted upon by NELAC Committees by May 10, 1999. All appointments by the NELAC Chair must be complete by May 17, 1999.

5. Final QS Chapter for NELAC V

Final changes to standards are due to Research Triangle Institute by April 29, 1999 for posting on the NELAC Web page prior to the annual meeting. This version will be posted within a week and half of receipt and will remain as the final proposed text for Annual Meeting.

6. Agenda for NELAC V

Final committee agendas, including discussion items and times, are due to Elizabeth Dutrow by May 10, 1999.

Attachment D

ACKNOWLEDGMENT LETTER, REVIEW GUIDELINES, AND COMMENTER TEMPLATE
QUALITY SYSTEMS COMMITTEE
APRIL 20, 1999

Date:

Dear :

On behalf of the Quality Systems Committee, thank you for your comments on the Chapter 5 standards of the National Environmental Laboratory Accreditation Conference (NELAC). The standards are routinely reviewed and updated. Continual improvement of the standards is the focal point of NELAC process. We encourage your continued written input as well as your attendance at the NELAC interim meeting and yearly conference. Also, our committee routinely schedules 1-2 open forum meetings during each calender year.

Our committee requests that all comments be supplied in electronic format (WordPerfect if possible) and that handwritten, hardcopy and the use of color fonts be avoided. Comments are considered by the QS committee on a first come basis. We have placed a template (table) for comments on the NELAC Web page, which we hope will ensure that the processes is efficient. With this process we hope that emphasis can be placed on consideration of the comments so that the available time is not spent in the mechanics of exchanging information (US Mail and re-typing comments). Routinely, each set of comments is assigned a QS leader who will complete the comment table including suggested language for any proposed changes to the NELAC standards. The Leader will guide a discussion of the comments during routine committee meetings. The minutes of the meeting (posted on the web site) will capture the information in the completed table from committee discussions, thoughts/rationale and present the final decisions.

Again, thank you for taking the time and effort to improve the NELAC Quality System standards.

Sincerely,
Joseph Slayton, Chair
Quality Systems Committee

QS Approach: Comments Received and QS Response:

1. A form letter will be sent to each commentor notifying them of receipt of the comment and of the QS's approach to reviewing comments and associated updates to the standards.

2. QS will consider the comments in the order received.

3. A QS committee member will be designated as the lead on each set (or up-set) of the comments from each commentor, who will provide written comments and who will lead a discussion with the full committee on any proposed changes to the standards (including providing the proposed standard language).

4. Proposed changes to the standards will be captured in the QS meeting minutes which are posted on the NELAC Web page.

5. All comments and written responses will be attached to QS meeting minutes.

6. No colors to be used in the comments nor in the response. Use double underlines for additions and strike-outs for removal of items.

7. All comments are to be provided in WordPerfect or rich text format using the following the following table:

GUIDING PRINCIPLES/REVIEW CRITERIA

The QS Committee established a set of criteria by which to evaluate the requirements specified in Chapter 5. The standards in Chapter 5 should meet the criteria listed below:

Flexible:

Allow laboratories freedom to use their experience and expertise in performing their work and allow for new and novel analytical methods and approaches, (e.g., Performance Based Measurement System [PBMS]). That the standards specify the "What" and avoid were possible the "How To", (e.g., control limits must be developed to determine if a QC check result is acceptable, the standards do not specify how the laboratory is to determine these limits).

Auditable:

Sufficient detail is included so that the accrediting authorities evaluate laboratories consistently and uniformly.

Practical/Essential:

The standards are necessary QA policies and QC procedures and that these standards should not place an unreasonable burden upon laboratories.

Widely Applicable:

International scope- consistent with ISO Guide 25. Represent QA policies, which establish essential QC procedures, that are applicable to environmental laboratories regardless of size and complexity.

Appropriate For The Use of the Data:

Helps ensure that associated environmental data is of known quality and that the quality is adequate for the intended use of the data.

Comment ID #: , Source of Comments (Name): QS Lead on Response (Name):			
Standard Rev. # SECTION# and QS Standard Narrative (To Filled In by Commentor)	**COMMENTwith Rationale to QS (To Be Filled in my Commentor)** **New Wording for Standard (To Be Filled In by Commentor)**	**QS Leader Provided Proposed Change (Commentor Leave Blank)**	**RATIONAL (from QS Leader) (Commentor Leave Blank)**